

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JONATHAN HADNOTT, JESSIE HADNOTT, and KEVIN HUNT,)	
)	
)	
Plaintiffs,)	Case No. 07 C 6754
)	
v.)	Judge David H. Coar
)	
UNKNOWN UNNAMED OFFICERS OF THE CHICAGO POLICE DEPARTMENT, and CITY OF CHICAGO,)	Magistrate Judge Schenkier
)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Plaintiffs JONATHAN HADNOTT, JESSIE HADNOTT, and KEVIN HUNT, by and through their attorney, Irene K. Dymkar, and pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, hereby move this Court to enter an order granting leave to file an amended complaint. In support of their motion, plaintiffs state:

1) This action was commenced by the filing of a complaint alleging a cause of action under the Civil Rights Act of 1871 (42 U.S.C. §1983) to redress deprivations of the civil rights of plaintiffs through acts and/or omissions of defendants committed under color of law.

2) Plaintiffs seek to add another plaintiff, Brandell Betts, to this action and also to add Count VI, alleging a *Monell* claim. A copy of the proposed amended complaint is attached hereto as Exhibit A.

3) The CITY OF CHICAGO is already a defendant in this case and I have had several discussions with defense counsel regarding a *Monell* claim. The allegations supporting the claim contain facts of which defense counsel is well aware. There is no surprise and no prejudice.

4) This amendment will not delay this case and the parties should still be able to comply with the Court's discovery closure deadline.

5) Rule 15(a) states that leave to amend a complaint shall be freely given when justice so requires.

WHEREFORE, plaintiffs request that the Court grant them leave to file the amended complaint attached hereto as Exhibit A.

Dated: May 16, 2008

/s/ Irene K. Dymkar
Irene K. Dymkar

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